

Paul James Toscano, Bar #3280
Paul Toscano, P.C.
10 Exchange Place, Ste 614
Salt Lake City, Utah 84111
Telephone: (801) 359-1313
ptoscano@expresslaw.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

In re:	Case No.: 12-34498 JTM
CHRIS & ANNETTE GATES	Chapter: 13
Debtors	FILED ELECTRONICALLY

**NOTICE OF MOTION FOR EARLY PAYOFF OF CHAPTER 13 PLAN
AND
NOTICE OF OPPORTUNITY FOR HEARING**

Objection Deadline: August 23, 2017

**Hearing Date: August 30, 2017 at 9:30 a.m. Room 341 United States Bankruptcy Court,
District of Utah, 350 South Main Street, Salt Lake City, UT 84101**

PLEASE TAKE NOTE that Chris and Annette Gates ("Debtors") have filed with the United States Bankruptcy Court for the District of Utah a MOTION FOR EARLY PAYOFF OF CHAPTER 13 PLAN (the Motion).

The Debtors are requesting that the Court to issue an order allowing them to pay to the Chapter 13 Trustee the required estimated \$2,220.00 necessary for an early payoff of their Chapter 13 Plan, plus any additional amounts up to \$550.00 necessary to pay their counsel for legal services incurred in achieving such early payoff.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not

have an attorney, you may wish to consult one. NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant the relief requested in the Motion then you or your attorney must:

(1) On or before August 23, 2017, file with the Bankruptcy Court a written Objection, explaining your position at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101.

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before August 23, 2017. You must also mail a copy to the undersigned counsel, Paul Toscano, at the law office of Paul Toscano, P.C., 10 Exchange Place, Suite 614, Salt Lake City, UT 84111.

(2) Attend a hearing on August 30, 2017, at 9:30 a.m. in Courtroom 341, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, UT 84101. There will be no further notice of the hearing and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an order approving the Motion without hearing.

Dated this 28th day of July 2017

/s/

Paul Toscano, attorney for Debtors

CERTIFICATE OF SERVICE – BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I hereby certify that on July 28, 2017, I electronically filed the foregoing **NOTICE OF MOTION FOR EARLY PAYOFF OF CHAPTER 13 PLAN AND NOTICE OF OPPORTUNITY FOR HEARING** with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system.

- Patti H. Bass ecf@bass-associates.com
- Lon Jenkins tr ecfmail@ch13ut.org, lneeb@ch13ut.org
- Paul James Toscano ptoscano@expresslaw.com, r41549@notify.bestcase.com
- United States Trustee USTPRegion19.SK.ECF@usdoj.gov

CERTIFICATE OF SERVICE – MAIL, OTHER

I hereby certify that on July 28, 2017, I caused a true and correct copy of the foregoing **MOTION FOR EARLY COMPLETION OF CHAPTER 13 PLAN** to all parties listed on the official matrix of this case as of July 28, 2017, except to those listing duplicate addresses on that matrix and those requesting notice via ECF and to:

Wells Fargo Bank, N.A.
PO Box 10438
MAC# X2505-036
Des Moines, IA 50306-0438

_____/S/_____
Paul Toscano, attorney for Debtors

Label Matrix for local noticing
1088-2
Case 12-34498
District of Utah
Salt Lake City
Fri Jul 28 11:59:38 MDT 2017

33

(p)AMERICREDIT FINANCIAL SERVICES DBA GM FINAN
PO BOX 183853
ARLINGTON TX 76096-3853

AT&T Universal Card
PO BOX 6500
Sioux Falls, SD 57117-6500

Patti H. Bass
3936 E. Ft. Lowell Road
Suite 200
Tucson, AZ 85712-1083

Absolute Resolutions Corp.
Care of Recovery Management Systems Corp
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Bonneville Collections
PO Box 150621
Ogden, UT 84415-0621

CHESWOLD (OPHRYS), LLC
C O WEINSTEIN AND RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

Cach, LLC
4340 South Monaco, 2nd Floor
Denver, CO 80237-3485

Capital One Bank (USA), N.A.
P.O. Box 71083
Charlotte, NC 28272-1083

Capital One, N.A.
Bass & Associates, P.C.
3936 E. Ft. Lowell Road, Suite #200
Tucson, AZ 85712-1083

Citibank
P.O. Box 6406
The Lakes, NV 88901-6406

Denovus Corporation
480 Johnson Rd., Suite 110
Washington, PA 15301-8936

EOS CCA
PO BOX 556
Norwell, MA 02061-0556

Enhanced Recovery Company, LLC
8014 Bayberry Road
Jacksonville, FL 32256-7412

Annette Lee Gates
13275 South Minuteman Drive, #144
Draper, UT 84020-7987

Chris Alan Gates
13275 South Minuteman Drive, #144
Draper, UT 84020-7987

Global Credit and Collection Corp.
300 International Drive
PMB #10015
Buffalo, NY 14221-5783

HSBC Retail Services
PO BOX 49353
San Jose, CA 95161-9353

IHC Health Services
3930 West Parkway Blvd.
Salt Lake City, UT 84120-6300

Internal Revenue Service
Centralized Insolvency Operations
P.O. Box 7346
Philadelphia, PA 19101-7346

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Lon Jenkins tr
405 South Main Street
Suite 600
Salt Lake City, UT 84111-3408

John C. Bonewicz, P.C.
350 North Orleans Street
Suite 300
Chicago, IL 60654-1607

Joshua S. Mirel
111 North Higgins, Suite 400
Missoula, MT 59802-4401

Larsen Law Firm PLLC
Executive Plaza - Suite 2J
121 Fourth St. N., PO BOX 1692
Great Falls, MT 59403-1692

McGuigan Law Office, LLC
311 Veterans Highway
Suite 100 A
Levittown, PA 19056-1422

Monarch Recovery Management, Inc.
PO BOX 16119
Philadelphia, PA 19114-0119

Paul Toscano, P.C.
Newhouse Building, Suite 614
10 Exchange Place
Salt Lake City, UT 84111-5120

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Paul James Toscano
The Law Office of Paul Toscano, P.C.
Newhouse Building, Suite 614
10 Exchange Place
Salt Lake City, UT 84111-5120

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

United States Trustee
Ken Garff Bldg.
405 South Main Street
Suite 300
Salt Lake City, UT 84111-3402

Utah State Tax Commission
210 North 1950 West
Salt Lake City, UT 84134-9000

Verizon Wireless
PO Box 26055
Minneapolis, MN 55426-0055

WF Financial Cards
CSCL DSP TM MAC N8
PO BOX 14517
Des Moines, IA 50306-3517

Wells Fargo Bank
Overdraft Recovery Payment Pro. Dept.
A0143-042
P.O. Box 63491
San Francisco, Ca 94163-0001

Wells Fargo Bank N.A.
PO Box 10438
MAC# X2505-036
Des Moines, IA 50306-0438

Wells Fargo Bank, N.A.
P.O. Box 54180
Los Angeles, CA 90054-0180

Wells Fargo Card Service
PO BOX 14517
Des Moines, IA 50306-3517

Wells Fargo Consumer Credit Solutions
PO BOX 9210
Des Moines, IA 50306-9210

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

AmeriCredit
P.O. Box 78143
Phoenix, AZ 85062

Jefferson Capital Systems LLC
PO BOX 7999
SAINT CLOUD MN 56302-9617

Portfolio Recovery Associates, LLC
POB 41067
Norfolk VA 23541

U.S. Bank
Mail Location Cn-Wn-15
425 Walnut Street
Cincinnati, OH 45202

(d)US BANK N.A.
BANKRUPTCY DEPARTMENT
P.O. BOX 5229
CINCINNATI, OH 45201-5229

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Capital One, N.A.
Bass & Associates, P.C.
3936 E. Ft. Lowell Road, Suite #200
Tucson, AZ 85712-1083

End of Label Matrix
Mailable recipients 39
Bypassed recipients 1
Total 40